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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91203730
Party	Defendant Super T Financial Inc. DBA LoanZilla
Correspondence Address	JOHN JANEWAY JANEWAY PATENT LAW PLLC 2208 NW MARKET ST, SUITE 508 SEATTLE, WA 98115 UNITED STATES marianne@janewaypatentlaw.com, john@janewaypatentlaw.com
Submission	Defendant's Notice of Reliance
Filer's Name	Marianne E. Dutton
Filer's e-mail	marianne@janewaypatentlaw.com, john@janewaypatentlaw.com
Signature	/Marianne E. Dutton/
Date	08/08/2013
Attachments	SECOND AMENDED NOR SUPER T.pdf(159459 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of Application Serial No. 85/316,446
For the Mark LOANZILLA Filed
May 19, 2011
Published in the Official Gazette on October 11, 2011

ZILLOW, INC.,

Opposer,

٧.

Opposition No. 91203730

SUPER T FINANCIAL INC. DBA LOANZILLA,

Applicant.

APPLICANT'S SECOND AMENDED NOTICE OF RELIANCE

Applicant amends its Notice of Reliance to add additional description regarding relevance of the evidence presented in the original notice. No other information has been added to the notice. The exhibits as-filed on 16 July 2013 with the Trademark Trial and Appeals Board and served on counsel for Opposer on remain unchanged, and have not been re-filed with this amended notice.

Respectfully submitted,

Dated 8 August 2013

John Janeway Janeway Patent Law, PLLC 2208 NW Market St Suite 508 Seattle, WA 98107 206.708.7705 john@janewaypatentlaw.com

Attorneys for Applicant,
SUPER T FINANCIAL INC. DBA LOANZILLA

Super T Financial Inc. dba Loanzilla Applicant:

Serial No.: 85/316,446 Filed: : May 19, 2011
Mark : LOANZILLA
Page : 2 of 8

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Second Amended Notice of Reliance has this 8th day of August 2013 been served via e-mail, as agreed by the parties, to counsel for Opposer, Zillow Inc., Matthew Schneller at Matt.Schneller@bgllp.com, and submitted via ESTTA to the Trademark Trial and Appeals Board. The exhibits as filed on 16 July 2013 have not been changed, and for this reason have not been re-filed or served with this amended notice.

> /Marianne E. Dutton/ Marianne E. Dutton

Super T Financial Inc. dba Loanzilla 85/316,446 May 19, 2011 LOANZILLA 3 of 8 Applicant: Serial No.: Filed: Mark

Page

EXHIBIT A

NOR Ex. No.	Description	Relevance
001	LoanZilla's First Set of Interrogatories and Zillow's Responses	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
002	Zillow's First Set of Interrogatories and LoanZilla's Responses and Supplemental Responses thereto	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
003	TSDR Report - U.S. Reg. No. 3,099,409 - Bridezillas	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
004	Wikipedia printout - 9 July 2013 – Bridezillas - en.wikipedia.org/wiki/Bridezillas	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
005	Newsweek article 19 June 2013 – How America is exporting its bridezilla culture	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
006	TSDR Report - U.S. Reg. No. 3,597,655 - Bugzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
007	Wikipedia printout 9 July 2013 - Bugzilla - en.wikipedia.org/wiki/Bugzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
008	Screenshot 9 July 2013 – Bugzilla webpage – bugzilla.org	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar

Super T Financial Inc. dba Loanzilla 85/316,446 May 19, 2011 LOANZILLA 4 of 8 Applicant: Serial No.: Filed: Mark

: 4 of 8	
	marks
TSDR Report - U.S. Reg. No. 3,187,334 - Mozilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
Wikipedia printout - 9 July 2013 – Mozilla - en.wikipedia.org/wiki/Mozilla/	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
Mozilla webpage screenshot - 9 July 2013 – Mozilla.org	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
TSDR Report - U.S. Reg. No. 4,217,670 - Filezilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
Wikipedia printout - 9 July 2013 – Filezilla - en.wikipedia.org/wiki/FileZilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
Screenshot 9 July 2013 – Filezilla webpage - filezilla-project.org/	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
TSDR Report - U.S. Reg. No. 3,119,435 - Shopzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
Screenshot LinkedIn Update – 9 July 2013 – Shopzilla - linkedin.com/company/shopzilla-inc	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
Screenshot 9 July 2013 – Shopzilla webpage – Shopzilla.com	At least the likelihood of
	TSDR Report - U.S. Reg. No. 3,187,334 - Mozilla Wikipedia printout - 9 July 2013 – Mozilla - en.wikipedia.org/wiki/Mozilla/ Mozilla webpage screenshot - 9 July 2013 – Mozilla.org TSDR Report - U.S. Reg. No. 4,217,670 - Filezilla Wikipedia printout - 9 July 2013 – Filezilla - en.wikipedia.org/wiki/FileZilla Screenshot 9 July 2013 – Filezilla webpage - filezilla-project.org/ TSDR Report - U.S. Reg. No. 3,119,435 - Shopzilla Screenshot LinkedIn Update – 9 July 2013 – Shopzilla - linkedin.com/company/shopzilla-inc

Super T Financial Inc. dba Loanzilla 85/316,446 May 19, 2011 LOANZILLA Applicant: Serial No.: Filed: Mark

Page	:	5 of 8

Page	: 5 of 8	
		confusion – similarity of marks, extent of potential confusion, number of similar marks
018	TSDR Report - U.S. Reg. No. 4,146,204 - Armedzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
019	Screenshot 9 July 2013 – Armedzilla webpage Armedzilla.com	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
020	TSDR Report - U.S. Reg. No. 4,186,105 - RevZilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
021	PRWeb article printout – 29 May 2013 – Revzilla.com	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
022	Screenshot 9 July 2013 – Revzilla website – Revzilla.com	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
023	TSDR Report - U.S. Reg. No. 4,288,072 - Popzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
024	Screenshot – Popzilla television program popzilla.tv	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
025	TSDR Report - U.S. Reg. No. 4,286,103 - Nomzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
026	Screenshot 9 July 2013 – homepage of Nomzilla.com	At least the likelihood of

Super T Financial Inc. dba Loanzilla 85/316,446 May 19, 2011 LOANZILLA **6** of **8** Applicant: Serial No.: Filed: Mark

Page	: 6 of 8	
		confusion – similarity of marks, extent of potential confusion, number of similar marks
027	TSDR Report - U.S. Reg. No. 3,612,254 - Archzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
028	TSDR Report - U.S. Reg. No. 2,515,370 - Bosszilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
029	TSDR Report - U.S. Reg. No. 3,282,121 – Bulb-zilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
030	TSDR Report - U.S. Reg. No. 4,170,450 - Carezilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
031	TSDR Report - U.S. Reg. No. 3,864,001 – Casca Zilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
032	TSDR Report - U.S. Reg. No. 4,157,173 - ChillZilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
033	TSDR Report - U.S. Reg. No. 3,813,823 - Freightzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
034	TSDR Report - U.S. Reg. No. 3,700,072 - Fruitzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
035	TSDR Report - U.S. Reg. No. 4,349,771 - Guardzilla	At least the likelihood of confusion – similarity of

Super T Financial Inc. dba Loanzilla 85/316,446 May 19, 2011 LOANZILLA 7 of 8 Applicant: Serial No.: Filed: Mark

Page	: 7 of 8	
		marks, extent of potential confusion, number of similar marks
036	TSDR Report - U.S. Reg. No. 4,308,060 - IceZilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
037	TSDR Report - U.S. Reg. No. 4,044,836 - Moldzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
038	TSDR Report - U.S. Reg. No. 3,648,761 – Mow-Zilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
039	TSDR Report - U.S. Reg. No. 3,704,733 - Nursezilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
040	TSDR Report - U.S. Reg. No. 4,200,024 – Office Zilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
041	TSDR Report - U.S. Reg. No. 3,794,440 – orgzilla!	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
042	TSDR Report - U.S. Reg. No. 3,675,433 - Rackzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
043	TSDR Report - U.S. Reg. No. 4,356,949 - Schoolzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
044	TSDR Report - U.S. Reg. No. 3,638,985 - Sportzilla	At least the likelihood of confusion – similarity of marks, extent of potential

Super T Financial Inc. dba Loanzilla 85/316,446 May 19, 2011 LOANZILLA 8 of 8 Applicant: Serial No.: Filed: Mark

Page	: 8 of 8	
		confusion, number of similar marks
045	TSDR Report - U.S. Reg. No. 3,643,122 - Stripezilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
046	TSDR Report - U.S. Reg. No. 3,761,056 - Superzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
047	TSDR Report - U.S. Reg. No. 4,269,402 - Tankzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
048	TSDR Report - U.S. Reg. No. 3,576,075 – Techzilla by Qwest	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
049	TSDR Report - U.S. Reg. No. 4,088,855 - Troutzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
050	TSDR Report - U.S. Reg. No. 4,156,492 – Tweet Zilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
051	TSDR Report - U.S. Reg. No. 3,539,183 - Zilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
052	TSDR Report - U.S. Reg. No. 3,829,645 - Zilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
053	TSDR Report - U.S. Reg. No. 3,386,521 - Zilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar

Super T Financial Inc. dba Loanzilla 85/316,446 May 19, 2011 LOANZILLA **9** of **8** Applicant: Serial No.: Filed: Mark

rage	. 9018	
		marks
054	TSDR Report - U.S. Reg. No. 4,343,731 - Zilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
055	TSDR Report - U.S. Reg. No. 4,034,566 – Zilla Combos	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
056	TSDR Report - U.S. Reg. No. 3,388,657 - ZillaMail	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
057	TSDR Report - U.S. Reg. No. 3,366,465 – Zilla-Tool	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
058	Article – University Wire - October 3, 2005 Zilla pushes underground upward with 'Monsters'	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
059	Article – Huntsville Times - July 5, 2013 Zilla breaks down each track on album	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
060	Screenshot 9 July 2013 – Zilla reptile products homepage - zilla-rules.com	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
061	Screenshot 9 July 2013 – Zilla reptile products listing - zilla-rules.com/products/	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
062	Wikipedia screenshot 9 July 2013 – usage of the suffix 'zilla' - en.wikipedia.org/wiki/-zilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar

Super T Financial Inc. dba Loanzilla 85/316,446 May 19, 2011 LOANZILLA **10** of **8** Applicant: Serial No.: Filed: Mark Page

rage	. 10 01 8	marks
063	Wikipedia screenshot 9 July 2013 – History of Godzilla - http://en.wikipedia.org/wiki/Godzilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
064	Screenshot 9 July 2013 – Go!Zilla Download Manager – gozilla.com	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
065	Article – PRNewswire – 18 July 2000 ZDNet Names Radiate's Go!Zilla No.1 Software utility	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks; use of the mark
066	Screenshot 9 July 2013 – Domaintools web history of Loanzilla.com	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks; history of use of the mark
067	Screenshot 10 July 2013 LoanZilla homepage - http://www.domaintools.com/research/screenshot-history/loanzilla.com/	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
068	Screenshot 9 July 2013 – Clonezilla – clonezilla.org	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
069	Screenshot 9 July 2013 – Alexa.com	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
070	Screenshot 9 July 2013 – Baconzilla - http://burgatory.wordpress.com/2009/07/17/words-cannot-describe-checkers-baconzilla/	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks

Super T Financial Inc. dba Loanzilla 85/316,446 May 19, 2011 LOANZILLA Applicant: Serial No.: Filed: Mark Page **11** of **8**

rage	. 11 01 0	
071	Screenshot 9 July 2013 – Godzilla star Hollywood Walk of Fame	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
072	Screenshot 11 July 2013 - Rarzilla software – techspot.com/downloads/5374-rarzilla-free-unrar.html	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
073	Screenshot 11 July 2013 - Eventzilla homepage – eventzilla.net	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
074	Screenshot 11 July 2013 – Zillamedia homepage – zillamedia.net	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
075	Screenshot 11 July 2013 – Wikizilla – godzilla.wikia.com/wiki/Wikizilla	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
076	Screenshot 11 July 2013 – Rapzilla Christian Music online magazine - rapzilla.com/rz/	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
077	Screenshot 11 July 2013 – Fedzilla homepage – Fedzilla.net	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
078	Screenshot 11 July 2013 – Warpzilla software page - mozilla.org/ports/os2/	At least the likelihood of confusion – similarity of marks, extent of potential confusion, number of similar marks
079	U.S. Census Bureau – Historical Census of Housing Data – Home values	At least the likelihood of confusion – sophistication of

Super T Financial Inc. dba Loanzilla 85/316,446 May 19, 2011 LOANZILLA 12 of 8 Applicant: Serial No.: Filed: Mark Page

1 age	. 12 01 0	
		purchasers
080	U.S. Census Bureau News Joint Release – U.S. Department of Housing and Urban Development	At least the likelihood of confusion – sophistication of purchasers
081	Screenshot 16 April 2012 – Zillow Mortgage Marketplace http://www.zillow.com/mortgage/help/HowZillowIsDifferent.htm	At least the likelihood of confusion – similarity of marks, extent of potential confusion
082	Screenshot 12 July 2013 – Mortech - http://mortech.com/	At least the likelihood of confusion – similarity of marks, extent of potential confusion